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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

11 In the Matter of the Statement of Issues Against:

Case No. 2008-373

12 **ROBIN RENEE CASEY, AKA**
13 **ROBIN R. CASEY, AKA**
14 **ROBIN RENEE SAYER, AKA**
15 **ROBIN RENEE CAMERON**
16 1328 Magnolia Avenue
Redding, CA 96001

STATEMENT OF ISSUES

Respondent.

17 Complainant alleges:

18 **PARTIES**

- 19 1. Ruth Ann Terry, M.P.H., R.N. ("Complainant") brings this Statement of
20 Issues solely in her official capacity as the Executive Officer of the Board of Registered Nursing
21 ("Board"), Department of Consumer Affairs.
- 22 2. On or about December 19, 2007, the Board received an Application for
23 Licensure by Examination for a registered nurse license ("application") from Robin Renee Casey,
24 also known as Robin R. Casey, Robin Renee Sayer, and Robin Renee Cameron ("Respondent").
25 On or about December 10, 2007, Respondent certified under penalty of perjury to the truthfulness
26 of all statements, answers, and representations in the application. The Board denied the
27 application on February 4, 2008.

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1 **FIRST CAUSE FOR DENIAL OF APPLICATION**

2 (Criminal Conviction)

3 6. Respondent's application is subject to denial pursuant to Code sections
4 480, subdivision (a)(1), and 2761, subdivision (f), in that Respondent was convicted of the
5 following crimes:

6 a. On or about February 7, 2007, in the Superior Court of California, Tehema
7 County, in the matter entitled *People of the State of California v. Robin Renee Sayer* (Super. Ct.
8 Tehema Cty., 2007, Case No. NCR70899), Respondent was convicted by the court on her plea of
9 guilty of violating Vehicle Code section 23152, subdivision (b) (driving under the influence of
10 alcohol with .08% or greater blood alcohol level).

11 b. On or about November 8, 2005, in the Superior Court of California,
12 Tehema County, in the matter entitled *People of the State of California v. Robin Sayer* (Super.
13 Ct. Tehema Cty., 2005, Case No. NCR67033), Respondent was convicted by the court on her
14 plea of no contest of violating Penal Code section 148, subdivision (a)(1) (resisting, obstructing,
15 or delaying an officer).

16 **SECOND CAUSE FOR DENIAL OF APPLICATION**

17 (Acts Which if Done by a Licentiate Constitute Cause for Discipline)

18 7. Respondent's application is subject to denial pursuant to Code 480,
19 subdivision (a)(3), in that Respondent committed acts, which, if done by a licentiate constitute
20 cause for discipline, as follows:

21 a. Respondent committed acts that constitute a cause for discipline pursuant
22 to Code section 2761, subdivision (f), as more fully set forth in paragraph 6, subparagraphs a and
23 b, above.

24 b. Respondent committed an act that constitutes a cause for discipline
25 pursuant to Code section Code section 2761, subdivision (a), on the grounds of unprofessional
26 conduct as defined in Code section 2762, subdivision (b), and Code section 2762, subdivision
27 (c), as more particularly set forth in paragraph 6, subparagraph a, above.

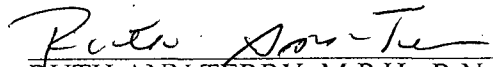
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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Denying the application of Robin Renee Casey, also known as Robin R. Casey, Robin Renee Sayer, and Robin Renee Cameron, for a registered nurse license; and,
2. Taking such other and further action as deemed necessary and proper.

DATED: 7/1/08


RUTH ANN TERRY, M.P.H., R.N.
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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